REPLY DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 22

February 21, 2000

To: Paul O'Sullivan,
Director-SBC/AT&T Account Team
From: Sarah De Young
RE: Status of RCMAC Problem

Dear Paul,

Per our discussion this morning, this message documents AT&T's understanding of the facts and current status of the SWBT RCMAC system problem which resulted in a number of premature disconnects of AT&T customers.

Based on our discussion, it is AT&T's understanding that a Telcordia-provided software upgrade was installed by SWBT on February 2, but it was not until February 8 that AT&T and SWBT first received reports of no dial tone from SWBT retail customers who had placed orders with AT&T/TCG and whose UNE-L hot cut orders were confirmed and scheduled for cutover. In at least one case where I am aware of the specific details, the end user lost service on February 8, a full day before his scheduled service conversion.

SWBT characterized the problem on 2/8 as a defect in the Telcordia upgrade to the RCMAC system which caused the system to prematurely disconnect end users' service regardless of due date. SWBT later clarified the problem to be a logic problem in SOAC/MARCH processing in which the due date was being pulled from the incorrect key date field that was isolated to flow-through FDT orders for all 5 SWBT states.

SWBT confirmed on 2/10 that a software patch had been received and installed by Telcordia. In the intervening period between 2/8 and the installation of the patch on 2/10, SWBT stated that a manual workaround, consisting of SWBT personnel allowing RCMAC to mechanically disconnect pending service orders followed by manual restoration, was in place. You confirmed that you are not aware that a permanent fix has been identified or implemented.

Since receipt of the first trouble report on 2/8, AT&T/TCG has requested a PON/Service Order list of customers affected by this problem, including the associated duration of each outage. Despite AT&T providing our own candidate list on 2/11, this list has still not yet been provided. However, as we discussed, since the affected end users were SWBT retail customers at the time of disconnection, AT&T assumes that many end users contacted SWBT directly and did not open a trouble report with AT&T. AT&T/TCG also had a number of residential orders for its HFC cable telephony and Fixed Wireless products in Dallas and St. Louis pending during this time period and, based on SWBT's explanation of the problem, believes that those orders should appear on the list of affected orders as well. You advised this morning that the list will be provided later today.

We have also had a great deal of dialogue regarding how these service outages will or will not be captured in the current SWBT performance measures. Despite some initial confusion, SWBT has now confirmed that these FDT premature disconnects will in fact be captured in the February, 2000 reporting of Measure 114 (based on SWBT's proposal in a January 21 FCC ex parte to include disaggregated data for both CHC and FDT in Measures 114, 114.1 and 115 beginning in February). You also correctly pointed out that this type of premature disconnect (which affected the switch translations rather than the loop itself) would also be captured in Measure 96 were it currently implemented.

As we discussed, AT&T seeks a root cause analysis and corrective action plan which addresses this problem, and which is designed to prevent similar problems in the future. Please advise when this analysis, as well as updated information on the permanent software fix, will be available.

Finally, please be advised that AT&T/TCG has elected to discontinue use of the FDT process for all UNE Loop orders effective 2/10 until this and other serious process and system issues are addressed and corrected. As we discussed, I have already requested that the issue of process improvements for the FDT process be added to the agenda for the next CLEC User Forum.

Please provide a written response by Friday, February 25, clarifying any of the above facts and updating status on the root cause analysis and permanent fix.

REPLY DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

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BEHALF OF AT&T CORP.

ATTACHMENT 23

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REPLY DECLARATION OF

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ON

BEHALF OF AT&T CORP.

ATTACHMENT 24

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REPLY DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 25

> Sent: Thursday, February 03, 2000 2:23 PM
> To: Chambers, Julie S, NLSSS
> Cc: Dalton, Nancy M, NLSSS; YOUNG, DAVID E; O'SULLIVAN, PAUL
> Subject:
> Importance: High
>
>
>
> Julie:
> Per our discussion yesterday, AT&T's change in how they are
> processing and sending EDI files to SWBT is a serious problem. As you
> indicated yesterday AT&T has started sending only 2 EDI transmissions per
> day (batching up large volumes before sending). Not only was SWBT not
> apprised in advance of this change but this is significant departure from
> the mode AT&T has been using previous. Additionally due to the large
> volumes being sent within a short period of time this change has caused
> some
> slow down in our processing which can have an adverse effect on the
> processing of other CLEC's orders. As I indicated, yesterday AT&T sent
> 3,150 files within a 1 hour period and today we received 2,180 files
> within
> a 30 minute period. As a result of the negative impacts this type of
> processing is causing and might cause we need to take immediate steps to
> limit the number of AT&T files SWBT will process per hour. SWBT can manage
> the volume of AT&T files processed within any given hour and we would like
> to set that process to a pace of no more than 500 files per hour. This
> would not require any changes on AT&T's side. SWBT would accept all files
> from AT&T but hold them and process them at the agreed upon pace (no more
> than 500 per hour). Our plans are to implement this change immediately but
> we need AT&T's concurrence. Upon AT&T's notification that it will return
> to
> it's usual mode of transmission, we will remove/adjust this management
> process.
>
>
> Please provide a positive response ASAP indicating your concurrence
> or not.
>
>
> Thanks,
> Robert Bannecker
>
> Account Manager - Industry Markets
> Southwestern Bell Telephone Company
> 311 So. Akard, Rm. 630.08
> Dallas, TX 75202
> 214-464-1053 - Office
> 214-858-0281 - Fax
> 888-961-8352 - Pager
> rb5422@txmail.sbc.com - E-Mail
>
>

REPLY DECLARATION OF

NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 26

Sandy Kinney
President-
Industry Markets

SBC Telecommunications, Inc.
One Bell Plaza, Suite 5705
Dallas, Texas 75202
Phone 214 464-5111
Fax 214 464-0510

SBC

July 15, 1999

VIA FACSIMILE

Mr. Rian Wren
President – Southwest Region
AT&T
5501 LBJ Freeway, Suite 800
Dallas, TX 75240

Dear Rian:

In response to your July 12th letter, let me, as clearly and concisely as I can, address your questions.

1) As was stated in my last letter to you, we will have a fully "automated process" in place by August 16th to process orders associated with AT&T's project of converting its embedded base of customers now served through resale with customized routing to UNE. We will not accommodate AT&T's request for "an end-to-end audit of SWBT's systems and processes to identify all points of manual intervention." As noted in my earlier letters, the situation giving rise to AT&T's complaint has been thoroughly and completely addressed. AT&T's "audit" request is both unnecessary and unwarranted.

2) As noted in your letter, we continue to "isolate the situation as being specific to AT&T's Resale to UNE migration order type" because that is the truth. The uniqueness of AT&T's orders was fully delineated in my previous letter. During the course of SWBT's OSS development other customers certainly may have experienced isolated service outages due to a variety of causes. As with AT&T, SWBT has identified any problems associated with such outages and implemented solutions to those issues on a timely basis. SWBT, however, is not prepared to respond to inquires from AT&T based on unsupported speculation that an issue involving another carrier "reportedly" is "the same" as that experienced by AT&T.

3) Our teams continue to hold discussions regarding your concern about delayed posting of orders. I believe it is important for you to understand that SWBT does have an Error Resolution Team that monitors posting reports and assists

as necessary to assure your orders post in a timely manner. In addition, we have recently refined our process to monitor the posting of service orders to the backend systems for those isolated instances where the order does not post. This process enhancement should improve your utilization of the Toolbar applications.

4) As we have previously shared with AT&T, SWBT is in the process of providing our technicians a refresher training on the proper manner to handle your tickets. We began delivering this training on June 24th and anticipate completion over the next four weeks. This training will re-instruct them not to contact an AT&T end user without AT&T initiating such contact via a service order or a trouble ticket.

Separately, I understand AT&T submitted a large volume of resale to UNE orders (approximately four thousand) on July 14th. Our refined "AIN process" handled your orders as promised. Although your orders were all handled without any apparent disruption to your end users, we did experience some internal congestion at our interface. Today, we made the necessary system changes to eliminate this congestion.

Specifically, SWBT prepared its queuing of orders from AT&T based upon the pre-OSS test ordering process. SWBT did not queue AT&T's orders submitted yesterday in the same manner in which AT&T's orders were queued during the OSS test. As demonstrated in the OSS test, our systems can handle AT&T's order volume. We now have configured our systems consistent with the configuration used during the OSS test to process your orders regardless of the manner in which they are received.

Rian, I would again like to suggest that we jointly plan this migration of orders associated with your Market Readiness Test. As we have demonstrated, we can and will react quickly to the "tests" you create. Our goal is to assist you in your market expansion but we can better accomplish that by working together prospectively rather than for us to continually be in the mode of responding as events happen.

I trust that we can allow our teams to once again focus on working to support AT&T's expansion in the marketplace rather than continue this campaign of exchanging letters. If you feel this matter needs to be discussed further, I suggest we set aside some time at our third officers' meeting this year, scheduled for July 29th.

Sincerely,

Sandy Kinney

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NANCY DALTON and SARAH DEYOUNG

ON

BEHALF OF AT&T CORP.

ATTACHMENT 27

ATTACHMENT M (Reference: Section 5)

Capacity Test Details: Process Flow, Workload, and Environment, Scalability

This attachment provides background that explains process flows, measured parameters and characterization of the workloads used in the Capacity Tests (CTs). It also includes background information on the SWBT Firewall (the LRAF OSS). The reader is referred to this appendix for the following information regarding each Preorder and Order CT:

- Process flows
- Workload characterizations
- Measured parameters
- Hardware and software characterizations
- CT monitoring observations
- Simultaneous Users on LRAF

1. Process Flow

1.1 Logical Flow for the Preorder CT

Figure 1 depicts the flow between CLEC and SWBT systems for preorder activity. This flow shows both DataGate and Verigate.

6.2 Hardware Used for Order CTs

At the time of the testing, the order OSSs – the EDI gateway and LASR – resided on the (same) MVS computer that Telcordia calls MVS Computer A. Independent applications of MOG/SORD resided on three independent MVS computers, one of which is MVS Computer A, along with the EDI gateway and LASR, and two other computers, MVS Computer B and MVS Computer C. In production and during this test, most (about 80 to 90 percent of) LSRs entered through MVS COMPUTER A. The geographical location of the service address on the LSR determined which of the three applications of MOG/SORD to access. Other applications also reside on MVS Computers A, B, and C but are not involved in the Order process.

Table 4 shows a list of the major applications that resided on the MVS Computers A, B and C at the time of the CT. Applications at SWBT may be moved from one system to another for load balancing. This movement helps balance the CPU resources among all available systems. In addition to the applications shown below, these systems also execute batch work for other SWBT applications. According to SWBT, executing this batch work uses CPU capacity which otherwise would be idle; if the CPU is needed for online work, the batch work is lower priority and hence preempted.

SWBT's MVS Processor ID	Region	Application
MVS Computer A	Dallas	Additional SWBT OSS
		CABS
		EDI Gateway, LASR, SORD
MVS Computer B	Houston	A job scheduling OSS
		A loop maintenance OSS
		Additional SWBT OSS
		CABS
		CRIS
		SORD
MVS Computer C	San Antonio	An OSS
		CABS
		CRIS
		SORD

Table 4 Applications on Each of the Three SWBT MVS Systems at the Time of the Order CTs

7. CT Monitoring Observations

7.1 Order CT Observations on Sunday May 16, 1999

The following observations shown in Table 1 were made during the Sunday, May 16, 1999, CT for SWBT Ordering Systems:

Time (CST)	Observation
8:00 AM	Arrive SWBT office for monitor duties – one person with applications group, one person with systems group
9:00 AM	A scheduled start of test, UNE-L CLEC Test Participant's Interactive Agent not responding as stated by the UNE-L CLEC Test Participant.
9:40 AM	SWBT reported getting time-outs for Acknowledgements to UNE-L CLEC Test Participant's Interactive Agent.
10:40 AM	UNE-L CLEC Test Participant reported a problem with their gateway. They could not launch their assigned LSRs in the 10 AM to 11 AM interval.
11:00 AM	SWBT reported that they (SWBT) are still getting timeouts. Telcordia requested that SWBT place a data analyzer (a "sniffer") on their router just inside the SWBT firewall. Send log to Telcordia.
11:10 AM	Telcordia observed that a regularly scheduled SWBT batch MVS program was executing and resulting in high MVS CPU utilization. No adverse effect observed to CT processes. Batch process ran for approximately 35 minutes.
11:22 AM	Telcordia requested UNE-L CLEC Test Participant to place data analyzer at their router. Send log to Telcordia.
12:00 PM	Telcordia observed that in response to a SWBT 855 transaction, the UNE-L CLEC Test Participant sent a 997 transaction. For the same circumstance, the UNE-P/Resale CLEC Test Participant did not send a 997 transaction.
1:00 PM	SWBT manually batched (made one file from) the incoming individual LSR files (sent by FTP) to form fewer files and reduce overhead. UNE-P/Resale CLEC participant is receiving 997 acknowledgments from SWBT. This was a result of SWBT system monitoring activities.
1:05 PM	UNE-L CLEC Test Participant unexpectedly did not send their LSRs in first two hours. As instructed by Telcordia, this CLEC Test Participant sent all their LSRs to this time in the hour of 12:00.
1:30 PM	UNE-L CLEC Test Participant is down for transmitting workload.
2:30 PM	UNE-L CLEC Test Participant reports that they can send a double hourly load to make up for the previous hour. Telcordia responded that they should send only their 1 to 2 PM load and then continue.
3:28 PM	SWBT had ABEND (Abnormal termination message) for memory overflow on their MVS processor – CT workload did not appear to be abnormally affected as far as can tell. UNE-L CLEC Test Participant sending scheduled load for 2 to 3 PM.
3:32 PM	UNE-L CLEC Test participant reported that one of their two available routers went down. How determined/verified?
3:45 PM	UNE-L CLEC Test Participant sending scheduled load for 3 to 4 PM.

The linear regression line in Figure 1 indicates that the system can process approximately 5,000 IMS transactions per hour for each 1% of IMS CPU used. The linear regression line in Figure 2 indicates that each LSR requires the processing of 27 IMS transactions. The linear regression line in Figure 3 indicates that the system can process approximately 185 (=5,000/27) LSRs per hour for each 1% of the CPU. Therefore, a CLEC load of 1000 LSRs per hour takes between 5% and 6% of the CPU. The busy hour of the CT (2310 LSRs) takes about 12% of the available CPU.

Figure 4 shows the relationship between the LASR plus SORD (including MOG) CPU and the IMS CPU used by the system. The high correlation indicates that the CT load is the sole significant cause of CPU utilization.

Notice that for all four figures the regression lines match well with the collected measurements. This is also reflected in the correlation coefficients (i.e., the R^2s in the figures), which are all greater than 0.97 (and very close to 1). Moreover, the coefficient of x (the slope of the regression line) in Figure 3 (i.e., 0.0054) is approximately the product of the coefficient of x in Figure 1 (i.e., 0.0002) and that in Figure 2 (i.e., 27.7). This implies that the regression lines represent a fairly accurate relationship between the significant parameters.

This analysis also allows Telcordia to extract the portion of the IMS CPU usage during a weekday test that is associated with CT LSR processing.

7.3 Order CT Observations on Wednesday May 26, 1999

The following observations in Table 2, were made during the Wednesday, May 26, 1999 CT for SWBT Ordering Systems:

Time (CST)	Observation
8:00 AM	Arrive SWBT office for monitor duties – one person with applications group, one person with systems group, additional monitors at both CLEC Test Participant input locations
9:00 AM	Scheduled start of blind test (not scheduled with SWBT)
9:10 AM	UNE-L CLEC Test Participant Interactive Agent does not respond.
9:35 AM	UNE-L CLEC Test Participant restarted their load generation tool. The 9 to 10 AM scheduled load completed by 10:08 AM.
12:00 PM	SWBT applied an automated procedure that would batch (make one file from) the individual FTP files. (SWBT applied this same procedure manually during the Sunday test. As a result the automated file was developed)
12:40 PM	UNE-L CLEC Test Participant processor went down briefly and was restarted.
2:00 PM	UNE-P/Resale CLEC Test Participant reported sporadic failures of the FTP Puts to connect.
2:37 PM	SWBT created a separate set of ports for incoming FTP files for "toll data sets" in an effort to determine a solution to what appeared to be a problem with the inability of the UNE-P/Resale CLEC Test Participant to open multiple FTP files.
2:50 PM	Telcordia requested SWBT to place a data analyzer outside the EDI Gateway toward the UNE-P/Resale CLEC side.

Time (CST)	Observation
3:00 PM	The CLEC Test Participant reported substantial number of failures of the FTP Puts to connect.
4:14 PM	UNE-L CLEC Test Participant requested to bring down their load generation tool for about half an hour. Telcordia agreed to the request. CLEC Test Participant shut down at 4:37 PM.
5:30 PM	UNE-L CLEC Test Participant's load generation tool is back up. Telcordia requested they resume their hourly rates of transmission. CLEC Test Participant and SWBT conferred on delays that CLEC Test Participant experienced in receiving 997s.
5:45 PM	UNE-P/Resale CLEC Test Participant completed sending their workload about 5:45 PM. (At this time, the number of LSRs that SWBT reported receiving was substantially less than the workload launched by the CLEC Test Participants. SWBT did not know, nor did Telcordia tell them, the number of LSRs that were launched by the CLEC Test Participants.)
5:50 PM	Telcordia requested UNE-L CLEC Test Participant to stop all LSRs for the CT (This request was made due to circumstances involving an FTP problem).

Table 2. Observations During May 26, 1999 Order CT

7.4 Order CT Observations on Monday June 21, 1999

The following observations defined in Table 3, were made during the Monday, June 21, 1999, CT for SWBT Ordering Systems:

Time (CST)	Observation
8:00 AM	Telcordia arrives at SWBT office for monitor duties – two people with applications group, one person with systems group. Additional monitors arrive at all CLEC Test Participant input locations.
9:00 AM	Scheduled start of unscheduled test
12:00 PM	SWBT applied an automated procedure that would batch (make one file from) the individual FTP files. (SWBT had applied this same procedure manually during the Sunday test. They had also applied it in an automated procedure during the previous weekday test.)
2 PM	As of this time, Telcordia observed that activity at all CLEC Test Participants and SWBT went on schedule
About 3:00 PM	UNE-P/Resale CLEC Test Participant reported delay in seizing FTP ports. At this time, the CLEC Test Participant was using 16 simultaneous sessions. That is, the CLEC Test Participant was sending and receiving up to 16 simultaneous transactions.
3:00 PM	Process utilization on the UNE-P/Resale CLEC Test Participant's load generation tool and the SWBT MVS processor each remained near 100% for longer than an hour.

Time (CST)	Observation
4:15 PM	Telcordia attempted to collect definitive data that would explain the UNE-P/Resale CLEC-reported FTP slow-down in port availability. Telcordia requested the UNE-P/Resale CLEC Test Participant and SWBT to confer on the delay problem for FTP and retain their logs from their data analyzers. The UNE-P/Resale CLEC Test Participant reduced their simultaneous sessions to 12. Although the observed delays apparently disappeared by 4:35 PM, no evidence at this time suggested that any actions by the participants caused the problem to disappear.
4:45 PM	Telcordia observer monitored SWBT personnel attempting to determine FTP port availability slowdown. SWBT measurements indicated "idle" time during FTP sessions. Logs did not contain sufficient information to determine the cause. Problem went away at approximately 5 PM.
5:20 PM	By this time, the UNE-P/Resale CLEC had completely launched their LSRs and shut down their operation.
6:00 PM	By this time, the UNE-L Test Participant had completely launched its LSRs and shut down their operation.
4:00 to 6:00 PM	The UNE-P/Resale CLEC transmitted several LSRs that were not specified in the MTP. These were negotiated to be included ahead of time.

Table 3. Observations during June 21, 1999 Order CT

8. Simultaneous Users on LRAF (SWBT's Firewall)

The Local Service Provider Remote Access Facility (LRAF) is the first and last point of contact in the SWBT network for transmission between a CLEC and SWBT. There are two issues relevant to LRAF regarding access to the SWBT systems. The first is whether LRAF can support a number of simultaneous users that is consistent with the 1Q2000 forecast. The second is whether LRAF might create a significant response-time delay. The second issue is especially important because SWBT does not include the time in LRAF in any of the Performance Measurements. Although Telcordia did not explicitly test a live LRAF OSS, they addressed these issues based on the LRAF architecture and functions.

Figure 5 shows a high-level architecture of access to LRAF. A CLEC can access LRAF in either of two ways. By dial-up (telephone call) using the Public Switched Telephone Network, a CLEC user can access LRAF. Once connected to the SWBT applications through LRAF, the dial-up user has dedicated bandwidth up to the limit of the line – 56 kbps for analog and 128 kbps for ISDN. Using a T1 (1.544 mbps) private line, a group of users from a CLEC can access (without dial-up) the SWBT applications through LRAF. The number of users is limited by their combined bandwidth requirements.

The current LRAF configuration will support simultaneously 96 analog and 46 ISDN dial-in calls. Telcordia notes that the ultimate number of simultaneous dial-in users depends in part on the frequency of dial-ins, the duration of user session and the burstiness of the CLEC traffic. SWBT says that they can augment the LRAF with additional routers to handle a larger number of dial-in calls.

As mentioned, the practical limit on simultaneous users accessing LRAF by private line depends on the pooled bandwidth of the CLEC that leases the line. SWBT says they can add additional routers to provide for more private lines.

The nature of the LRAF functions would tend to cause delay on the order of milliseconds. The LRAF functions rely on cache memory for data retrieval rather than storage devices such as disks. Cache memory

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ON

BEHALF OF AT&T CORP.

ATTACHMENT 28

MORNING BRIEFCASE

National and international news at a glance

Canada's BCE to buy the rest of Teleglobe

MONTREAL — BCE Inc., Canada's No. 1 telecommunications company, said Tuesday that it will buy the 77 percent of Teleglobe Inc. it doesn't already own for about $6.7 billion ($9.7 billion Canadian) in stock to expand its international telephone network for electronic commerce and data services.

This is the second big strategic move for BCE in the last three weeks. In late January, the company said it would spin off most of a 39 percent interest in Nortel Networks.

Teleglobe, the world's third-largest carrier of voice telephone traffic, is based in Montreal, as is BCE.

BCE's shares fell 75 cents to $173.25 Canadian dollars before trading was halted on the Toronto Stock Exchange. Teleglobe rose to $47.55 Canadian dollars.

BCE's chief executive, Jean Claude Monty, will become Teleglobe's chairman immediately. He said that fully owning Teleglobe would give BCE and its subsidiaries a strong international focus.

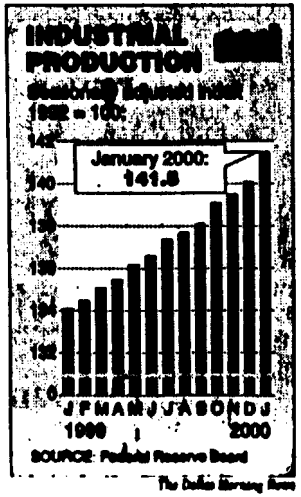
Industrial production strongest in 18 months

WASHINGTON — Industrial production leaped ahead in January at its strongest rate in nearly 18 months as the output of a wide range of goods including cars, computers and carpets all posted big gains.

The booming U.S. economy — fueled by robust consumer and business spending — and a pickup in overseas demand for U.S. goods as countries continue to recover from a global financial crisis were the main factors behind the surge, analysts said.

The need for manufacturers to keep up with torrid demand both abroad and domestic had factories running full throttle during January," said Richard Yamarone, an economist with Argus Research Corp.

Output at the nation's factories, utilities and mines jumped 1 percent in January, the fastest growth spurt since a 1.8 percent increase in August 1998, the Federal Reserve said Tuesday.



AT&T says SBC slow to switch clients

From Staff and Wire Reports

AUSTIN — AT&T Corp. asked the Public Utility Commission Tuesday to reconsider an application from SBC Communications Inc. to enter the long-distance market.

AT&T alleges in a news release that SBC cannot process requests to allow telephone customers to switch to AT&T or other companies as quickly as it had promised.

San Antonio-based SBC must show it provides rivals equal access to its 11 million local customers before the Federal Communications Commission will approve the application.

The U.S. Department of Justice announced Monday that it would recommend that the FCC deny the application because SBC failed to show it was providing that access.

"All we are trying to do is get the PUC to take another look at SBC's operations support systems," said Kerry Hibbs, an AT&T spokesman.

If SBC enters the long-distance market, it would compete with AT&T.

Telephone giant swamping firm with requests, company counters

The PUC endorsed SBC's application in December. Lisa Mayes, a PUC spokeswoman, said late Tuesday that she did not know how, or even whether, AT&T's request would affect the endorsement.

Mr. Hibbs said that earlier this month, SBC told AT&T that it could only process 500 requests an hour to change local service, not the 2,000 an hour it told the PUC in December.

SBC spokesman Selim Bingol said the company had asked AT&T to limit its orders to 500 an hour so SBC could process orders from other competitors at the same time.

"This should have no impact on customers that want to switch, so long as AT&T operates within the spirit of the law," he said, adding that SBC can, in fact, handle 2,000 orders an hour.

Mr. Bingol said AT&T provoked the spat about a week ago when it started sending thousands of orders in batches twice a day, instead of sending them in a steady stream as it had for months.

"It is just unfortunate that they are trying to do this via a press release," he said. "I guess we can expect that as we get closer to long-distance."

Shares of SBC were down 44 cents Tuesday to $40.50, and AT&T was down 25 cents to $48.13.

On Monday, the Justice Department faulted SBC's efforts to open the Texas local telephone market to competition and urged denial of the firm's application to provide long-distance service in the state.

"SBC has not shown that it is providing nondiscriminatory access to its local lines," said Assistant Attorney General Joel Klein, who heads Justice's antitrust division.

Under the 1996 Telecommunications Act, the Justice Department serves as an adviser to the commission but cannot veto a long-distance application. The FCC has until April 9 to act on the application.

SBC Communications, through its Southwestern Bell Telephone Co. subsidiary, hopes to become the second of the so-called Baby Bells created after the breakup of AT&T Corp. to offer long-distance service.

The 1996 act requires the Baby Bells to open their local phone service markets before they are allowed to sell long-distance service.

In December, Bell Atlantic won FCC approval to offer long-distance service in New York.

Staff writer Jim Landers and The Associated Press contributed to this report.

Dallas Morning News file photo: Huri Vallhonc

Neiman's names new chairman

By Maria Halkias

Staff Writer of The Dallas Morning News

Neiman Marcus Stores named H.W. Hugh Mullins chairman and chief executive, the company said Tuesday.

Mr. Mullins, 48, was previously vice chairman of the Dallas-based retail chain.

He started his career at Neiman's in 1991 when he was hired from Macy's to be a vice president-divisional mer-

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ON

BEHALF OF AT&T CORP.

ATTACHMENT 29

AT&T PROPOSALS FOR OSS TEST DESIGN, EXECUTION AND ADMINISTRATION

The TPUC Evaluation inaccurately states that "[t]he Technical Advisory Group (TAG) drafted this plan [Master Test Plan]."[1] As the following representative list demonstrates, AT&T's suggestions regarding the scope, design and administration of the test, as well as the specific content of the test plan, were largely overlooked both in the original drafting process and as Telcordia produced revised versions. None of the following AT&T proposals, for example, are reflected in Telcordia Master Test Plan.

AT&T Recommendation	Source
Requirement that all test results and test progress documentation be shared contemporaneously with test participants	AT&T Supplemental Comments on Master Test Plan, 5/25/99 (SWBT Appendix D, Vol. 1, Tab 27)
Prohibition against private tutorials between SWBT and the vendor, with public record work sessions regularly scheduled to permit the vendor to ask questions	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98; (SWBT Appendix C, Vol. 73, Tab 1200)
Completion of test plan prior to actual initiation of any testing; advance identification of exit and success criteria	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98 (SWBT Appendix C, Vol. 73, Tab 1200); AT&T Supplemental Comments on Master Test Plan, 5/25/99 (SWBT Appendix D, Vol. 1, Tr. 27)
End-to-end functionality volumes set at 30,000 test cases, transmitted at a rate of 6,000/per day for 5 days	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98; (SWBT Appendix C, Vol. 73, Tab 1200)
Capacity testing to include 30,000 test cases per day for 5 days; peak usage (i.e. stress) testing to be included as part of the capacity testing; inclusion of capacity test cases that may require manual handling	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98 (SWBT Appendix C, Vol. 73, Tab 1200); AT&T Supplemental Comments on Master Test Plan, 5/25/99 (SWBT Appendix D, Vol. 1, Tr. 27)
Stress testing of maintenance and billing capabilities	AT&T's Comments on Bellcore's [n/k/a Telcordia] Draft Master Test Plan for OSS Testing, 3/29/99; (SWBT Appendix D, Vol. 1, Tab 15)
Promote blindness on the part of the test subject, including exclusion from discussions on test scenarios and specific test cases	AT&T's Letter re Issues to be Addressed by Bellcore in OSS Testing Process, 3/18/99 (SWBT Appendix D, Vol. 1, Tab 13)
Validation of data collection processes prior to test execution; inclusion of a wider set of performance measures against which test data would be evaluated handling	N. Dalton Affidavit, 12/10/98 (SWBT Appendix C, Vol. 91, Tab 1375); AT&T Supplemental Comments on Master Test Plan, 5/25/99 (SWBT Appendix D, Vol. 1, Tr. 27)
Selection of multiple vendors (no single proposed candidate possessed ability to execute/administer all aspects of test); generation of test cases by one of chosen vendors using available documentation; test ability to utilize documentation to develop system capabilities.	N. Dalton Affidavit, 12/10/98, SWBT Appendix C, Vol. 91, Tab 1375; AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98, (SWBT Appendix C, Vol. 73, Tab 1200); see also AT&T's Response to SWBT's Proposal for Carrier-to-Carrier Testing, 11/3/98 (SWBT Appendix C, Vol. 73, Tab 1208) (evaluate ability of CLECs to interpret available

[1] TPUC Evaluation, p. 5. TAG members are identified as TPUC, SWBT, Telcordia, AT&T, MCI/World Com, Allegiance, NorthPoint, Covad and E*Spire. Id. at n.7.

AT&T Recommendation	Source
	documentation for system development); AT&T's Letter re Scope of the Third-Party Test and Role of the Third-Party Consultant, 12/1/98 (SWBT Appendix D, Vol. 1, Tab 3) (vendor to generate test files)
Coverage of all entry options, including complex business orders and migration of multiline accounts, over all interfaces	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98; (SWBT Appendix C, Vol. 73, Tab 1200)
Examination of collocation processes as defined by tariff	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98 (SWBT Appendix C, Vol. 73, Tab 1200)
Validity and operation of change control processes, including impact of lack of versioning; disapproval of SWBT's unilateral insistence that standard change management processes were suspended.	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98 (SWBT Appendix C, Vol. 73, Tab 1200); AT&T Supplemental Comments on Master Test Plan, 5/25/99 (SWBT Appendix D, Vol. 1, Tr. 27)
Analysis of account management support and effective/timely dissemination of information to CLECs	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop 10/30/98 (SWBT Appendix C, Vol. 73, Tab 1200)
Analysis of SWBT internal service order generation process, including coordination of "disconnect" and "new" orders	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98 (SWBT Appendix C, Vol. 73, Tab 1200)
Evaluation of ability to update databases (e.g. LIDB) using an LSR-driven process	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98 (SWBT Appendix C, Vol. 73, Tab 1200)
Analyze accuracy and timing of all billing records, including those needed for reciprocal compensation and access billing	AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98 (SWBT Appendix C, Vol. 73, Tab 1200); AT&T E-mail to TAG, 3/9/99, attached to AT&T's Letter to Commissioners Regarding the OSS Testing, 3/18/99 (SWBT Appendix D. Vol. 1, Tab 15)
A description of how critical data from SWBT's retail operation would be gathered in order to complete the parity analysis called for by the TPUC; in particular, the test plan would have outlined a strategy for making a parity analysis comparing the reject and reject notification processes in the retail and wholesale environments	AT&T Supplemental Comments on Master Test Plan, 5/25/99 (SWBT Appendix D, Vol. 1, Tr. 27); see also AT&T's Letter re Documents for Discussion During the OSS Collaborative Workshop, 10/30/98, (SWBT Appendix C, Vol. 73, Tab 1200); N. Dalton Affidavit, p. 39-40,12/10/98 (SWBT Appendix C, Vol. 91, Tab 1375.
Independent verification of the existence and extent of manual handling at SWBT's end.	AT&T's Response to SWBT's Proposal for Carrier-to-Carrier Testing, 11/3/98 (SWBT Appendix C, Vol. 73, Tab 1208)
Contemporaneous work sessions on commercial activity	AT&T's Report on Recent Commercial Activity Issues Impacting Customer Service, 9/2/90 (SWBT Appendix C, Vol. 126, Tab. 1775)
Public workshop to allow examination of basis for results provided in final report	AT&T's Request for Workshop on OSS Testing Final Report, 9/29/99 (SWBT Appendix D, Vol. 6, Tab 71)